

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*2303 W. Cherry Street, Milwaukee, WI and a
2010 white Nissan Altima

Case No. 23-1844M(NJ)

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

Please see Attachment A.

located in the Eastern District of Wisconsin, there is now concealed *(identify the person or describe the property to be seized)*:

Please see Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1951(a)	Hobbs Act Robbery
18 U.S.C. § 924(c)	Brandishing a Firearm during a Crime of Violence

The application is based on these facts:

Please see Affidavit.

- ☒ Continued on the attached sheet.
☒ Delayed notice of 30 days *(give exact ending date if more than 30 days)* is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's Signature

Heather Wright, Special Agent, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
TELEPHONE *(specify reliable electronic means)*.

Date: 10/30/2023City and state: Milwaukee, WI
Judge's signature

Honorable Nancy Joseph, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
APPLICATIONS FOR SEARCH WARRANTS**

I, Heather Wright, being first duly sworn, hereby depose and state as follows:

I. BACKGROUND AND EXPERIENCE

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the premises at **2303 W. Cherry Street, Milwaukee, WI** and a **2010 white Nissan Altima**, both of which are further described in Attachment A, for the things described in Attachment B.

2. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since July of 2010. Since August of 2020, I have been assigned to the FBI's Milwaukee Area Violent Crimes Task Force, a multi-jurisdictional law enforcement entity charged with investigating violations of federal law, including bank robberies, commercial robberies, armed motor vehicle robberies, and other violent crime matters, defined under Title 18 of the United States Code. I have been trained in a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting of search warrant affidavits, and probable cause. I have participated in criminal investigations, surveillance, search warrants, interviews, and debriefs of arrested subjects. As a result of this training and investigative experience, I have learned how and why violent actors typically conduct various aspects of their criminal activities.

3. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to conduct investigations of and to make arrests for federal offenses.

4. The facts in this affidavit come from my training and experience, my review of documents and information obtained from other agents/law enforcement officers. This affidavit is intended to show merely that there is probable cause for the requested warrant and does not set forth all my knowledge about this matter.

II. DESCRIPTION OF THE LOCATIONS TO BE SEARCHED

5. As further described in Attachment A, the location and property to be searched are the following:

- a. **2303 W. Cherry Street, Milwaukee, WI:** The location is more particularly described as a two-story residence, light yellow colored siding, with blue trim, and a chain linked fence surrounding the house. The number 2303 is posted on the northeast corner, on the northern portion of the siding. This residence is referred to as the “Target Location”.
- b. **A 2010, white Nissan, Altima:** The vehicle is more particularly described as a 2010, white Nissan, Altima, with dark tinted windows, aluminum wheel wells, sunroof, and WI plate AJF-7039. The VIN number on the vehicle is 1N4AL2AP0AN491991. This vehicle is referred to as the “Target Vehicle.”

III. FACTS SUPPORTING PROBABLE CAUSE

A. BACKGROUND OF INVESTIGATION AND INITIAL POSTAL ROBBERIES

6. Since October of 2022, the Federal Bureau of Investigation (FBI) and the Milwaukee Police Department (MPD) have been investigating a string of armed robberies of United States Postal Service mail carriers. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that **ABDI I. BABA, dob: XX/XX/1998**, has committed violations of Title 18, United States Code, Section 1591, Hobbs Act Robbery, and Title 18, United States Code, Section 924(c), Brandishing of a Firearm during a crime of Violence.

7. On October 25, 2022, the Milwaukee Police Department responded to an armed robbery complaint at 2650 N. Martin Luther King Drive, Milwaukee, Wisconsin. Upon arrival, officers spoke with the victim, identified as a United States Postal mail carrier, hereinafter referred to as D.D. D.D. reported that had been conducting his mail route around 2:30 P.M. near 2500 North Richards Street, when he was approached and robbed by four young males, who ran when he began to fight one of his assailants. During the struggle, that subject, successfully robbed him of his USPS-issued “arrow key”.

8. On January 28, 2023, a photo array was presented to D.D. with the target of the photo array as JESSIE L. COOK (dob: XX/XX/2003). D.D. identified COOK as the individual that had demanded his things and attacked D.D. on October 25, 2022. On December 7, 2022, the Milwaukee Police Department responded to 3205 N. Bremen Street, Milwaukee, Wisconsin, for an armed robbery of a United States postal mail carrier, hereinafter referred to as E.V. E.V. stated that at approximately 3:00 p.m., he had just finished delivering mail to 3219 N. Bremen Avenue, when he was approached and assaulted by two male subjects, one of whom demanded “Gimme everything” while pointing a small semi-automatic handgun at him. E.V. surrendered his USPS-issued “arrow key” and the subjects fled on foot. A canvas for video identified Ring camera footage which captured the incident. Multiple citizen witness’s statement identified the vehicle used by the assailants as a white Nissan Murano.

9. On January 27, 2023, a state residential search warrant related to a drug investigation was executed at 2519 N. Buffum Street, Milwaukee, Wisconsin. Prior to the execution, two black males and two black females were observed leaving the residence in a blue Toyota Camry. Shortly thereafter and just prior to the warrant execution, the blue Toyota returned with two of the four individuals inside. When officers approached the vehicle, they identified the individuals as MARVIN TURNER (dob: XX/XX/2000) and HUSSEIN A. HAJI (dob: XX/XX/2001). Officers then executed the search warrant and identified HURIA H. ABU (dob: XX/XX/2002), JESSIE L. COOK (dob: XX/XX/2003), AMAURIE D. SMITH (dob: XX/XX/2005) as well as two females who were not residents of the house, hereinafter “S. J”. and “S. W.”. A search of the residence resulted in the recovery of four semi-automatic handguns of different manufactures and calibers, as well as hundreds of pieces of stolen mail, including about 900 personal and commercial checks from Milwaukee, Shorewood, Brookfield, Brown Deer, and other municipalities. They further located checks being “washed” in acetone, keys on a bed located

in a bedroom that unlocked a safe which contained: \$7000, (1) USPS arrow key, (1) set of USPS keys, (20) cellular telephones, and (2) laptop computers. Officers also located keys for a Nissan Murano that unlocked a white Nissan Murano parked outside the residence and matched the vehicle description used in the October 25, 2022 and December 7, 2022 robberies.

10. Following the arrests of HAJI, COOK, ABU, SMITH and TURNER, interviews were conducted. During the interview of COOK, COOK stated to detectives that he was the primary user of the Nissan Murano located at the residence during the execution of the search warrant. COOK admitted to being involved in the robbery of the postal carrier on October 25, 2022. COOK stated that COOK was the individual that punched the postal carrier during the robbery, however, COOK would not state why the mail carrier was targeted or who he was with during the robbery. COOK stated to detectives that he was the owner of a Samsung Galaxy 20 black cellular phone with telephone number 262-389-0018.

11. During the interview of HAJI, he admitted to detectives that he had participated in the robbery of the mail carrier that had occurred on December 7, 2022. HAJI stated that ABU was the driver, and that COOK had the gun and pointed it at the white mail carrier. HAJI stated that they used the Nissan Murano, and that HAJI was the individual that took the arrow key from the mail carrier. HAJI also admitted to Detectives that they were after the specific arrow key that mail carriers carry during the robbery. HAJI stated that HAJI, COOK, and ABU participated in “mail runs”, which are when a person removes mail from mailboxes. HAJI stated that he has participated in approximately 40 mail runs in at least four different vehicles. HAJI stated that the target of the mail runs are personal checks and that they sell them after they are located. HAJI stated that one of the methods of payment when selling the checks is CashApp.

12. On February 2, 2023, a Wisconsin state search warrant was obtained for all the cellular phones seized during the search warrant executed at 2519 N. Buffum Street. A review of

the phones indicated that HAJI had obtained an arrow key, was using the arrow key to open mailboxes, steal personal checks from unwilling victims, and re-writing the checks to bank accounts associated to HAJI or another that HAJI had recruited to deposit the stolen check.

13. A review of the cellular phones further determined that ABU utilized the **Instagram username: riodinero.jr** with the **Instagram ID# 31452828829** (this account was located by FBI analysts and a photo of shoes with money as the profile picture was observed). On May 15, 2023, I swore to an affidavit requesting the authorization of a search warrant for ABU's Instagram and on May 15, 2023, the search warrant was authorized by the Honorable United States Magistrate Judge William E. Duffin. On June 8, 2023, writer received the results of the search warrant from Facebook and reviewed the results.

B. February 10th Robbery

14. On February 10, 2023, the Milwaukee Police Department responded to an armed robbery that had occurred near 5273 N. 27th Street, Milwaukee, at approximately 11:40 A.M. The victim was identified as a United States Postal carrier, hereinafter referred to as N.M. N.M. stated that he had been working mail route 88, had parked his mail vehicle near 2626 W. Rhor, and walked to the door to deliver the mail. N.M. stated that as he began to approach the residence of 5273 N. 27th Street from the north, he walked onto the small porch to place mail into the boxes. N.M. stated that he then observed three subjects come from the backyard (from the west of where he was) and surrounded him as he was on the porch. N.M. stated that he was somewhat trapped due to the railings on the porch and the three subjects surrounding him. N.M. stated that he had the ring of apartment keys in one pocket of his outer most jacket and the chain was exposed across his jacket leading to the Arrow key that was in the opposite pocket of his jacket.

15. N.M. described Subject #1 as a black male, approximately 22-27 years old, over 6'0" tall, medium brown complexion, wearing a black ski mask covering his head, face and neck,

with his eyes exposed, aviator sunglasses with plastic frames and gray/black lenses, a black hooded sweatshirt, dark jeans, unknown shoes, armed with a black Glock 9mm handgun with an extended magazine. N.M. described Subject #2 as a black, male, approximately 22-27 years old, over 6'0" tall, medium brown complexion, wearing a black ski mask covering his head, face and neck with his eyes exposed, "beach style" square sunglasses, a black hooded sweatshirt, dark blue jeans, unknown shoes, armed with a black Glock 9mm handgun with a tan extended magazine and switch attached to the back of the gun. N.M. stated that N.M. knew the term "switch" to be an added part on a gun that makes the firearm fully automatic. N.M. described Suspect #3 as a black, male, approximately 22-27 years old, over 6'0" tall, medium brown complexion, wearing a black ski mask covering his head, face and neck, with his eyes exposed, a black hooded sweatshirt, dark jeans, unknown shoes, armed with a black Glock 9mm handgun with an extended magazine.

16. N.M. stated that Suspect #1 was armed with a gun which he held at his side when he demanded N.M.'s keys. N.M. stated that he held up his hands while Suspect #1 grabbed the chain that was exposed outside of his jacket and took N.M.'s keys. N.M. stated that Suspect #2 approached him, used his gun to push up the brim of N.M.'s hat, and asked N.M. what else he had. N.M. stated that he told the suspect that he didn't have anything else. N.M. stated that Suspect #3 did not say anything to him or touch him, but was armed with a gun in his waistband and positioned himself with the other two Suspects. N.M. stated that after the suspects obtained N.M.'s keys, all three suspects fled on foot in the same direction they had approached. N.M. stated that he heard car doors opening and a vehicle drive away but he did not look into the alley to obtain a vehicle description nor which direction they fled.

17. A canvas for surveillance video was conducted and Ring video was located at 5248 N. 27th Street as well as surveillance video from 2800 W. Custer Ave. During the collection of the Ring video, officers were able to observe at 11:41AM, **a white 2007-2012, 4 door, Nissan Altima**

driving southbound through the alley at a high rate of speed. The vehicle had tinted windows (including front window brow only), a sunroof, side window deflectors, six spoke aluminum rims (split spokes), damage to rear passenger bumper/quarter panel, damage to front passenger quarter panel, dual exhaust, and front and rear unknown registration plates. During a review of the surveillance video obtained from 2800 W. Custer, Officers observed the **white Nissan Altima** approach the alley at 11:38 A.M., from the west and drive southbound in the alley. Multiple suspects can be observed exiting the vehicle and proceed towards where the victim was robbed. The white Nissan continues southbound in the alley following the incident.

C. SUBSEQUENT INVESTIGATION REGARDING THE ALTIMA

18. On February 13, 2023, at approximately 2:52 PM., a law enforcement member of the Milwaukee Area Violent Crimes Task Force (MAVCTF) observed a vehicle matching the above description driving west on North Avenue from 73rd Street. The vehicle was a **2010 Nissan Altima 4 door (WI plate AJF-7039) (the Target Vehicle)**. The vehicle subsequently pulled into the Brother's Plus Grocery Store located at 4020 W. North Avenue. Task Force Officers (TFOs) observed a thin black male with shoulder length dreads exit the vehicle's front passenger door and enter the business. The subject was wearing a black T-shirt, camouflage pants, and white/black shoes. The subject then exited the store and re-entered the **Altima's** front passenger door. TFO Strasser obtained a short video of the subject during the course of the surveillance.

19. The vehicle was then observed driving to and parking in the rear 2225 N. 35th Street. Task Force Officers were able to run the plate and noted that the vehicle listed to **ABDI BABA** (dob: 01/01/1998), with an address of **2303 W. Cherry Street (the Target Residence)**. This same vehicle was observed via a law enforcement camera system at West Silver Spring Drive and North Green Bay Avenue on February 10, 2023, at 11:08 A.M. The robbery occurred on February 10,

2023, at approximately 11:41 A.M and is 0.9 miles away from the West Silver Spring Drive and North Green Bay Avenue intersection.

20. A short video clip of the surveillance of the subject that was observed getting in and out of the **Nissan Altima** was shown to TFO Dolan, who was able to identify the subject as HURIA H. ABU, a subject that had been arrested during a related investigation on January 27, 2023. TFO Dolan was able to identify the subject as ABU based on his prior interactions with him.

21. On February 14, 2023, a state search warrant was obtained for a GPS tracker in order to identify location information for the **2010 Nissan Altima 4 door (WI plate AJF-7039) (the Target Vehicle)**, identified by law enforcement as the suspect vehicle in the February 10, 2023, armed robbery. On Friday March 3, 2023, a GPS was attached to the vehicle and the GPS began providing location information. Along with officers observing and locating the vehicle at 2303 W. Cherry Street (**the Target Residence**) in order to place the GPS onto the vehicle, during the monitoring of the GPS, Task Force Officers have observed the vehicle and monitored the vehicle's GPS location at the Cherry Street address on numerous occasions.

22. On March 13, 2023, Law Enforcement members of the MAVCTF and Milwaukee Police Officers responded to an armed robbery of a United States Postal carrier near 4548 N. 38th Street, Milwaukee. The victim, identified and hereinafter referenced as M.P., stated that at approximately 1:00 p.m., he parked his truck at 4501 N. 38th Street on the west side of the street, facing south. While delivering mail near that location, he was approached by two masked subjects who repeatedly walked past his truck, and later ran at him and robbed him. During the robbery, one of the subjects was armed with a "Draco" style semi-automatic handgun. The subjects targeted his keys, which were on a lanyard, and immediately fled on foot.

23. MAVCTF and Milwaukee Police Officers developed suspect descriptions and an identification of the suspect vehicle through witness statements and surveillance footage. The

suspect vehicle was identified as a 2009 Honda Civic bearing WI plate ABG-8200, which was traffic stopped by Whitefish Bay Police Department in December of 2022. The driver of the vehicle during that traffic stop was identified as HURIA H. ABU (dob: XX/XX/2002).

24. Following the arrest of COOK, ABU, SMITH, TURNER, and HAJI, on January 25, 2023, only COOK and HAJI were held in state custody. All others were released and on February 10, 2023, the next robbery of a United States Postal carrier for his Arrow key occurred. The suspect vehicle in that robbery was the **2010 Nissan Altima 4 door (WI plate AJF-7039) (the Target Vehicle)** registered to BABA who is associated to ABU. ABU was observed on February 13, 2023, exiting the Altima during a law enforcement surveillance. The suspect vehicle of the United States Postal carrier robbery on March 13, 2023 was identified as a 2009 Honda Civic 4 door (WI plate ABG-8200). ABU was stopped by Whitefish Bay Police Department on December 19, 2022, driving this suspect vehicle.

25. On March 20, 2023, I swore to an affidavit requesting Timing Advance “True Call” area search for all records and unique device/user identifiers pertaining to Timing Advance location information of the February 10, 2023 armed robbery of the mail carrier at 5273 N. 27th Street at around 11:40 a.m., and the February 10th law enforcement camera plate identification of the suspect vehicle at W. Silver Spring Drive and N. Green Bay Avenue around 11:41 a.m.. I received the results for that warrant from T-Mobile on March 28, 2023.

26. On March 24, 2023, surveillance was conducted by the FBI Surveillance Operations Group of the 2009 silver Honda Civic. FBI SOG members observed the driver of the vehicle, later identified as ABDI A. ABDI, dob: XX/XX/2001, exit the Honda Civic at the Fast and Friendly Grocery Store located at 311 W. Locust Street, Milwaukee. FBI SOG members observed ABDI exit the location and return to his vehicle. While walking to his vehicle, FBI SOG

members took photographs of ABDI exiting the location and were able to observe what appeared to be registration plates and a registration sticker in his left hand.

27. Later that same day, a traffic stop of the silver 2009 Honda Civic was conducted by the Milwaukee Police Department for expired registration tags affixed to the vehicle. The driver of the vehicle was identified as ABDI, indicated to officers, that the vehicle was registered in his name and had just obtained new plates and registration for the vehicle. ABDI indicated that the new plates for the vehicle were WI plate ASV-4406. Officers observed two other occupants inside the vehicle and identified the individuals as ABU and DARRION M. ALLISON, dob: XX/XX/2000. While officers were obtaining contact information for the individuals inside the vehicle, ABU indicated that his telephone number was 262-264-0206, ABDI indicated that his telephone number was 262-283-2100, and ALLISON indicated that his telephone number was 414-588-5392. Officers then released the vehicle without incident.

28. On March 27, 2023 at 12:20 am, Butler Police Department (BPD) Officer Knapp observed a suspicious vehicle, later identified as a silver 2009 Honda Civic, parked on the west side of N. 125th Street facing south with a defective head lamp and dark tinted windows. Officer Knapp ran the registration of the vehicle, WI plate ASV-4406, and the registered owner came back to ABDI, with a listed address of 5230 N. Sherman Blvd #23 in Milwaukee. A DOT check of ABDI revealed that ABDI had a suspended license for a failure to pay a forfeiture.

29. Officer Knapp turned his marked squad around and the vehicle pulled away from its parked position southbound N. 125th Street towards W. Hampton Avenue. As he was attempting to catch up to the vehicle to conduct a traffic stop for an equipment violation, Officer Knapp observed a male subject, later identified as ABDI, running from west side of N. 125th Street across N. 125th Street, eastbound in the alley behind Butler Auto Care, 12432 W. Hampton Avenue and south of 4820 N. 125th Street. While checking the area, Officer Knapp located ABDI and the other

male subject, identified verbally as DARRION M. ALLISON, dob: XX/XX/2000, walking northbound on the west side of the street through the snow along N. 124th Street in front of 4935 N. 124th Street.

30. After losing sight of both subjects, Officer Knapp regained eyes on the subjects and made contact with the individuals, who verbally identified themselves as ABDI and ALLISON. ALLISON told Officer Knapp that they were trying to get to the store. Officer Knapp then spoke to ABDI and asked why someone was driving his vehicle. ABDI told Officer Knapp that everyone was “good” and indicated that his cousin was driving his vehicle with his permission. Upon obtaining ABDI and ALLISON’s identifying information, ABDI stated that his telephone number was 262-283-2100 and ALLISON indicated that his telephone number was 414-588-5392. Officer Knapp then indicated to ALLISON and ABDI that they were free to leave.

31. After ABDI and ALLISON were released, Officer Knapp, again checked the area and observed the suspicious 2009 Honda Civic return. Officer Knapp activated his emergency lights and conducted a traffic stop on N. 125th Street, just south of W. Stark Street. Officer Knapp made contact with the driver, identified as HURIA H. ABU, and informed him of the reason for the traffic stop. Officer Knapp smelled a strong odor of marijuana inside the vehicle. ABU stated that he was in the area to obtain gas and that he was just “chilling” there and that “I always park right here.” Prior to walking back to his squad vehicle, ABU told Officer Knapp that Officer Knapp could check the vehicle out. Officer Knapp then searched the vehicle via consent from ABU. Officer Knapp located a box of blue latex gloves, 21.9 grams of a green leafy substance that later field tested positive for THC, a black and multicolor backpack containing a black Nike ski mask and **(17) personal checks made out to various individuals** issued from various individuals, most of whom resided in the City of Milwaukee. Officer Knapp also located (55) unused “cannabis flower” Ziplock bags, a box of 9mm Federal ammunition containing (20) unused round, a black

and red digital scale, and (2) additional checks in the glovebox along with (2) money orders totaling \$150 USC. Officer Knapp also located (4) Apple iPhones inside the vehicle.

32. Following the search of the vehicle, ABU was taken into custody and cited for possession of marijuana as well as possession of drug paraphernalia. ABU was transported to the Waukesha County Jail for booking and then released. Later that day, on March 27, 2023, Officer Knapp went back to the area of the location where ABDI and ALLISON had been questioned and observed (2) blue latex gloves on the east side of 4935 N. 124th Street. One of the blue latex gloves was located on the south side of the driveway entrance and the second glove was located on the north side of the driveway entrance.

33. On March 28, 2023, after speaking with me about the circumstances regarding the investigation on ABU as well as others, BPD Captain Brian Zalewski obtained video surveillance from the Village of Butler Town Hall. Captain Zalewski reviewed Village of Butler Town Hall security cameras during the timeframe of Officer Knapp's contact with ABU, ALLISON and ABDI. At 12:18:30 AM, the camera activated (as it is motion censored) as two subjects were observed next to, on the north side of, the blue mailbox in front of the Post Office. One subject was squatting down and appeared to be tampering with the bottom half of the mailbox. The second subject, who was the taller of the two, was standing behind the first subject. It should be noted that the blue mailbox had the lock and key access on the lower half of the side of the box facing north. At 12:18:32 AM, the subject squatting down stands up and both subjects began to walk towards N. 125th Street. The camera stopped recording at 12:18:45 AM.

34. Following a review of video surveillance, Captain Zalewski contacted the postmaster of the Butler Post Office, Karen Monreal, located at 12420 W. Hampton, one block from where the 2009 Honda Civic was parked the previous morning when ABU was arrested. Captain Zalewski stated that Monreal stated that the top of the bin in the front mailbox contained numerous

small packages, election ballots, and a small amount of mail located underneath the packages, however, based on her many years of experience working at this post office, the bin in the mailbox would normally be overflowing after the weekend. On that day, she considered the amount of mail lighter than the normal load.

35. On March 28, 2023, prior to ABU, ALLISON, and ABDI picking up their cellular telephones at approximately 4:45 p.m., an armed robbery of a mail carrier occurred at 4616 W. Hope Avenue, Milwaukee, Wisconsin. The victim, hereinafter A.A., was delivering mail at the location, when two suspects approached her while on the porch of the residence. Suspect 1 was described as a black, male, approximately 17 years old, approximately 5'5". With a slim build, wearing a gray hooded sweatshirt with the hood up, skinny blue jeans, and armed with a black semi-automatic hand gun in his right hand. Suspect 2 was described as a black, male, approximately 18 to 20 years old, approximately 5'4", and a stocky build. Suspect 1 pointed a black semi-automatic handgun at A.A.'s chest and demanded her keys multiple times. A.A. stated that Suspect 1 began to search the pockets of the USPS vest that A.A. was wearing and removed her personal Android phone, the key fob to the USPS mail truck, which was parked down the street, and removed a USPS tracking device that was on a strap around her neck. A.A. stated that the two suspects fled from the scene on foot, westbound on Hope Avenue and then south on N. 48th Street.

36. On April 23, 2023 and into April 24, 2023, Members of the Milwaukee Area Violent Crimes Task Force conducted a surveillance operation of known mailboxes that have experienced mail thefts. Postal Inspector Chris MASSARI provided information that the mailboxes at 5995 N Teutonia Ave (City and County of Milwaukee) and 5521 W Center St (City and County of Milwaukee) had both been targeted and had mail stolen from them.

37. On April 23, 2023, at approximately 11:15 p.m., officers observed two males running eastbound on W Florist Ave, towards N Teutonia Ave, where there were known USPS mailboxes. Suspect 1 was tall, possibly 6'00" to 6'03" with a medium build, wearing dark pants, a dark hooded sweatshirt with the hood up, and possible writing on the front of the sweat shirt. Suspect 1 was later identified as ALLISON. Suspect 2, was short, possibly 5'05" to 5'07" wearing what appeared to be an Adidas jacket or sweatshirt. The jacket or sweatshirt was dark or black with stripes going down the shoulders ending at approximately the elbow area. Suspect 2 was later identified as ABDI.

38. ALLISON acted as a lookout as ABDI crouched down and opened the mailbox located at 5995 N Teutonia Ave. The mailboxes can only be opened with an Arrow Key. The suspects removed what appeared to be mail from the mailbox and then fled westbound on W Florist Ave where they got into a vehicle parked on the south side of W Florist St in the 3400 block and then fled westbound in a dark colored Chevrolet Malibu, with no rear plate.

39. At approximately 12:00 a.m., FBI Analyst Emily SLAJUS observed via a live stream video feed, the same two subjects go to the mailboxes at the post office located at 5521 W Center Street, in Milwaukee, open the mailboxes, appear to take the mail, and then flee. FBI Analyst SLAJUS then communicated this to undercover MAVCTF surveillance units. Task Force Officer Michael SKEMP (Brookfield PD) and Special Agent Ian BYRNE were in an undercover vehicle and were travelling north on Sherman Blvd from W Wright St and responded to the area. TFO SKEMP called out the vehicle over Milwaukee Police Radio and a traffic stop was conducted.

40. The driver of the vehicle was identified as ALLISON and the front passenger seat was identified as ABDI. ABDI and ALLISON were arrested and taken into custody without incident. Following a search of ALLISON's person for officer safety, an Arrow Key with serial number 77-32733 on it was located in ALLISON's front left pocket which matched the key stolen

during the March 13th armed robbery. The Chevrolet Malibu's listed owner was ABU and was registered to the address of 2519 N Buffum Street. Inside of the glovebox of the Malibu were two pieces of mail addressed to ABU. A search of the vehicle was conducted by members of the MAVCTF. In the front passenger seat, where ABDI had been seated, were two large black plastic garbage bags containing approximately 400-500 pieces of mail, multiple bank cards, two personal checks, and a box of black garbage bags in the trunk of the vehicle.

41. On Monday, April 24, 2023, members of the MAVCTF observed ABU exit the Clark gas Station located at 2242 N. 12th Street in Milwaukee and enter a light blue Chrysler 200 with no plates. ABU was observed entering the driver's seat of the vehicle and drove east on North Avenue. A traffic stop of the Chrysler was conducted and ABU was taken into custody without incident.

42. In a Mirandized interview, ALLISON admitted to being a part of the robbery on March 13, 2023 at 4548 N 38th St in the City and County of Milwaukee. He said that robbery occurred because a few nights prior ABDI was using a different Arrow Key to get mail from mailboxes and the key broke off in the mailbox. ALLISON stated ABU was extremely upset about this and threatened ABDI to get another key. ALLISON explained ABU was known as "The Don" and was the leader of this group that steals mail, alters and cashes checks and robbed mail carriers for their USPS Arrow Keys. ALLISON stated that they refer to ABU as "the Don" but ABU preferred to be called "Wiz.". Following ALLISON's arrest, ALLISON's phone was recovered in the console of the vehicle and during the search of the vehicle, ALLISON was receiving a number of missed telephone calls from an individual saved in ALLISON's phone as "Wiz". ALLISON stated he believed that ABU would have hurt or killed ABDI if he did not get a new key.

43. ALLISON further stated that on March 13, 2023 he had met up with ABDI, ABU, LAZARUS JONES and DESHAWN ROBINSON. ALLISON stated that he was driving the

Honda and ABDI was in the back seat while ABU followed them in a Malibu. ALLISON stated that they drove around and eventually found a mail carrier. ALLISON stated that ABU then got into the Honda and JONES got into the Malibu. ALLISON stated that they then circled back around and he (ALLISON), ABDI, and ROBINSON went and robbed the mail carrier at gunpoint. ALLISON stated that ABDI had a Draco styled pistol that had been provided by ABU. ALLISON said ABDI found the key in the mail carriers' bag and pulled them out. After taking the keys, ALLISON stated that ABDI "racked" the Draco AK-47 and was scared that ABDI was going to shoot the mail carrier. ALLISON stated that they ran back to the vehicle after doing the robbery. ALLSION stated that as soon as they entered the vehicle, ABDI handed over the Arrow Key and the Draco styled pistol back to ABU. ALLISON stated that ABDI and ABU were all laughing about the robbery then. ALLISON said they did the robbery under the direction of ABU.

44. In a mirandized interview, ABU admitted to being present for the March 13th armed robbery and admitted knowing there would be a robbery for an Arrow Key. ABU also admitted to being the driver and look out during the December 7, 2022 armed robbery. ABU further admitted being present for the February 10, 2022 armed robbery and acknowledged that an Arrow Key was taken. ABU stated that BABA had approached ABU regarding obtaining a mail key from a postal carrier on February 10, 2023, and that BABA had participated in the robbery of the mail carrier on that date. ABU stated several times during the interview that he did not commit the robberies but that he was "party to a crime." ABU provided a consent to search for the cellular phone that was seized from his person at the time of his arrest.

45. Following his arrest, ABU's jail calls were monitored by members of the MAVCTF. During one of the monitored jail calls, ABU references his Instagram Accounts to a female caller in an attempt to have her login. ABU stated that his Instagram account username was

“29.wiz”. It was determined that this Instagram account had an Instagram ID# “31452828829”. This profile was publicly available and had a most recent public activity of June 2, 2022.

46. On April 11, 2023, a federal grand jury in the Eastern District of Wisconsin, issued a two-count indictment against HAJI for violations of Title 18, United States Code, Sections 1951(a) and 2(a) and Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2(a) and on June 27, 2023, a federal grand jury issued a nine count superseding indictment against ABU, COOK, HAJI, ABDI, and ALLISON, for violations of Title 18, United States Code, Sections 1951(a) and 2(a) and Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2(a), and Title 18, United States Code, Sections 1708.

47. On May 15, 2023, I swore to an affidavit requesting the authorization of a search warrant for the social media account identified by ABU as his Instagram account,” Instagram ID# “31452828829”, as well as others, and on May 15, 2023, the search warrant was granted. On June 7, 2023, the warrant return was received.

D. AUGUST 29, 2023 ROBBERY UTILIZING “DIRTY WHITE NISSAN”

48. On August 29, 2023, members of the MAVCTF responded to an armed robbery complaint of a USPS postal carrier. The victim, hereinafter referred to as D.W., stated that at approximately 12:20 p.m. that day, he was approached by (5) five armed suspects that demanded his USPS keys. D.W. stated that he was delivering mail near 1833 W. Galena Street, Milwaukee, when he observed an older, **dirty, white Nissan** sedan, park south of 1901 W. Galena Street. As D. W. approached his vehicle, he heard approaching footsteps behind him. D.W. stated that he heard one of the subjects tell him “don’t move”. D.W. turned and observed five armed subjects. D.W. described Subject #1 as a black, male, approximately 15-19 years old, approximately 5’8”-5’9”, slender build, wearing a full black balaclava style mask covering his head, face and neck, and a black hooded sweatshirt with the hood up. D.W. stated that Subject #1 was armed with silver

over black handgun described by D.W. as a possible Taurus G2. D.W. described Subject #2 as a black, male, approximately 15-19 years old, approximately 5'08-5'09", slender build, wearing a full black balaclava style mask covering his head, face and neck, and a black hooded sweatshirt with the hood up. D.W. stated that Subject #2 was armed with a handgun. D.W. described Subject #3 as a black, male, approximately 15-19 years old, approximately 5'08-5'09", slender build, wearing a full black balaclava style mask covering his head, face and neck, and a gray hooded sweatshirt with the hood up. D.W. stated that Subject #3 was armed with a handgun. D.W. described Subject #4 as a black, male, approximately 15-19 years old, approximately 5'08-5'09", slender build, wearing a full black balaclava style mask covering his head, face and neck, and a gray hooded sweatshirt with the hood up. D.W. stated that Subject #4 was armed a handgun. D.W. described Subject #5 as a black, male, approximately 15-19 years old, approximately 5'08-5'09", slender build, wearing a full black balaclava style mask covering his head, face and neck, and a gray hooded sweatshirt with the hood up. D.W. stated that Subject #5 was armed with a handgun.

49. D.W. stated that Subject #1 pointed the silver over black gun at D.W.'s head, while standing directly in front of him. D.W. stated that Subject #2 and Subject #3 approached D.W. and maintained a position directly to his left and right side. D.W. stated that Subject #2 then demanded D.W.'s keys. D.W. stated that he asked if the subjects wanted his USPS scanner or his cell phone and the subjects said no, they just wanted his keys. D.W. stated that Subject #2 then reached over and retrieved the keys off of D.W.'s belt loop on his right side. D.W. stated that Subject #4 was positioned directly behind Subject #1 and was armed but did not engage with D.W.. D. W. stated that Subject #5 was standing with Subject #4 behind Subject #1. D.W. stated that after Subject #2 took control of D.W.'s keys, Subject #4 retreated to the vehicle. D.W. stated that shortly after Suspect #4 left, Subject's #1, #2, #3 and #5 all fled on foot to the same vehicle, which had pulled into the intersection of N. 19th Street and W. Galena Street, facing northbound. D.W. observed the

suspect vehicle as a **white Nissan Altima** that he estimated was a late 2000's model. D.W. was not able to obtain a vehicle registration plate. D.W. stated that the vehicle was very dirty and needed a car wash.

50. Following the reported armed robbery, another USPS postal carrier, hereinafter D.A., reported to law enforcement that she had been in the area of N. 23rd Street and W. Galena Street shortly after 12:20 p.m., when a **dirty, white, Nissan sedan**, with extremely dark tinted windows, turned south on N. 23rd Street from W. Galena Street, at a high rate of speed.

51. I am aware that 2303 W. Cherry Street (the Target Residence) is located 0.1 Miles away from the intersection of N. 23rd Street and W. Galena Street and the route of travel to get to 2303 W. Cherry Street from N. 23rd and W. Galena would be south on N. 23rd Street. At 3:01 p.m., on August 29, 2023, a drive by of the Target Residence was done by members of the MAVCTF, and the **white Nissan Altima, bearing WI plate AJF-7039 (the Target Vehicle)** was observed parked on the parking slab of the residence. It should be noted that the vehicle has **extremely dark tinted windows** and was **noticeably dirty**.

52. Also following the robbery, on August 28, 2023, a check of FLOCK and ALPR vehicle images was done for the **Nissan bearing WI plate AJF-7039**. The return of the check included an ALPR hit of the vehicle on August 29, 2023, at 11:04 a.m., in the area of N. 35th and W. Center Street.

53. On September 1, 2023, I swore to an affidavit requesting authorization of a Timing Advance "True Call" area search warrant for all records and unique device/user identifiers pertaining to the Timing Advance location information from the August 29th ALPR hit, around the time of 11:04 a.m., from the area of N. 35th Street and W. Center Street, from the August 29th armed robbery location of 1833 W. Galena Street, around the time of 12:20 p.m., and from the area of **2303 W. Cherry Street**, around the time of 3:01 p.m., after the armed robbery took place

and the location where the white Nissan Altima was observed parked at the **Target Residence**. The warrant was authorized and served on or about September 1, 2023, and the results were received from T-Mobile on September 15, 2023.

54. Upon receipt of the results received on September 15, 2023, I was able to compare the information from both search warrants to the associated requested locations. There appeared to be a specific IMSI identified, IMSI 310260671044146, via the return, that was consistent with being in the geographic areas consistent with and around the report times of the below listed events. An IMSI is identified as the international Mobile Subscriber Identity which is a number that identifies a single unique customer in the T-Mobile network. The IMSI is similar to a driver's license in identifying the single user and is also related to a single telephone number on the network.

- February 10, 2023, registration plate image obtained, via a law enforcement camera system, at 11:08 a.m., of the **2010 Nissan Altima, bearing Wisconsin registration plate AJF-7039**, at W. Silver Spring Drive and N. Green Bay Avenue in Milwaukee.
- February 10, 2023 robbery of a postal carrier reported at 11:40 a.m.
- August 29, 2023 registration plate image obtained, via a law enforcement camera system, at 11:04 a.m., in the area of 35th and W. Center Street;
- August 29, 2023 drive by of **2303 W. Cherry Street** at 3:01 p.m. where the 2005 Nissan Altima, bearing Wisconsin registration plate AJF-7039, observed parked at the location;

55. The IMSI did not have any records in the return for the August 29, 2023 postal carrier armed robbery around 12:20 p.m. The closest record was at approximately 12:26 p.m., in the area around the address of **2303 W. Cherry Street (the Target Residence)**, where the Nissan

Altima had been observed. I also noted that these two locations are in close proximity and that a vehicle can travel between the two points within approximately 6 minutes.

56. On October 5, 2023, I swore to an affidavit requesting the subscriber and location information for the identified IMSI referenced above and, on October 5, 2023, the search warrant was granted by the Honorable Magistrate Judge Nancy Joseph. On October 6, 2023, I received the results of that search warrant from T-Mobile indicating that the phone number associated to IMSI 310260671044146, was assigned to cellular telephone number 414-501-0101. The location information for the cellular telephone began reporting at approximately 10:53 a.m. on October 6, 2023.

57. On October 10, 2023, I was able to search the Instagram return obtained on June 7, 2023, from Facebook, belonging to ABU, for the telephone number 414-501-0101, as well as previously-searched cellular phone downloads for the contact number 414-501-0101. The phone number was located in the telephone download of HAJI's phone (number 262-364-4059), which was seized during the January 27, 2023 search warrant executed at 2519 N. Buffum Street, and saved as contact "Big Bro Trigg (emoji)". The phone number was also identified within ABU's Instagram return and ABU identified the number 414-501-0101 as belonging to "trigg" on June 30, 2022.

58. Also, on December 29, 2022, ABU had the following chat with the Instagram ID 1379990481, with the username: "bmsm_east", which was identified and confirmed to be the Instagram account associated to COOK, where ABU identifies "Trigg" as **ABDI BABA**.

Author bmsm_east (Instagram: 1379990481)
Sent 2022-12-29 08:42:06 UTC
Body Scamilly sent an attachment.

Author rio.dinerojr (Instagram: 31452828829)
Sent 2022-12-29 16:41:13 UTC
Body 4145010101

Author rio.dinerojr (Instagram: 31452828829)
Sent 2022-12-29 16:41:47 UTC
Body You sent a photo.

Attachments image-944771610030045 (944771610030045)
Type image/jpeg
Size 15008
URL https://interncache-ftw.fbcdn.net/v/t1.15752-9/321978272_944771620030044_8253259414678991259_n.jpg?ccb=1-7&_nc_sid=73a6a0&efg=eyJ1cmxnZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9pbW9nZW46RFJlTWVkaWVdGlscyJ9&_nc_ad=z-m&_nc_cid=0&_nc_ht=interncache-ftw&oh=03_AdRuhgt08tgpL2uQxR1YRY1Z3uNvWPIRvNow2E9tjv75ZQ&oe=64417FDA



Photo ID 944771610030045

Author bmsm_east (Instagram: 1379990481)
Sent 2022-12-29 16:43:04 UTC
Body Wats the name



Author rio.dinerojr (Instagram: 31452828829)
Sent 2022-12-29 16:43:21 UTC
Body Abdi baba

Author bmsm_east (Instagram: 1379990481)
Sent 2022-12-29 17:26:00 UTC
Body Tell trig send it to me

59. I also searched ABU’s Instagram for the name “Trigg” and identified **Instagram ID 33244824003**. This Instagram ID had the Instagram username “Chickenchaser_trigg” on March 29, 2023. This Instagram account had multiple chats with ABU’s account regarding the term “slips”, a term I know to mean stolen checks, the term “arrow key”, and a conversation where I believe them to be discussing the robbery of a mail carrier on or around March 28, 2023. I also know there to have been a robbery of a mail carrier on March 28, 2023, at 4616 W. Hope Avenue, Milwaukee, Wisconsin. During the conversation, on March 29, 2023, “Chickenchaser_trigg” accuses ABU of “bussing moves” without him. I know the term “bussing moves” or “busting moves” to mean conduct illegal activity such as conducting an armed robbery. ABU denied doing

so in the chat and “Chickenchaser_trigg” stated he was “part of the plan” and didn’t get anything out of it. ABU stated that he doesn’t know anything about an “arrow key”. “Chickenchaser-trigg” then appeared to reference a time where they were conducting an armed robbery and “Chickenchaser_trigg” was the driver. ABU then stated that “chickenchaser_trigg” made them walk three blocks after the robbery. “Chickenchaser_trigg” stated that he was parked in the same spot that they left and that ABU was supposed to be selling him “a slip that same day”. “Chickenchaser_trigg” then stated “So the driver don’t get no Years the niggah that made sure y’all got away”. ABU replied “He parked behind a garbage tf thy giving him years for” and “I’m giving you slips.” “Chickenchaser_trigg” replied” You don’t give me no slips” “I buy slips.”

60. Since the location information began reporting for 414-501-0101 on October 6, 2023, the location that the cellular device was most consistently observed, was determined to be consistently near the **Target Residence**.

61. Case agents obtained further corroboration that the location information of 414-501-0101, is a true and accurate representation of the phone’s, associated to BABA, physical location, by conducting surveillance on Monday, October 23, 2023. At approximately 10:00 a.m., the received location information for BABA’s phone revealed that the phone data was consistent with being located at the **Target Residence**. The **Target Vehicle** was also observed parked on the west side of N. 23rd Street near the intersection of W. Cherry Street and N. 23rd Street. At 11:06 a.m., I observed BABA exit the **Target Residence** wearing dark gray/black pants, a light gray hooded sweatshirt and dark colored shoes. BABA had short dread lock styled hair. I observed BABA approach the **Target Vehicle** and enter the driver’s side of the vehicle at approximately 11:07 a.m. BABA drove north on 23rd Street and east on W. Cherry Street in the Target Vehicle. Upon driving away, I was able to corroborate BABA’s phone location at 11:09 a.m. as consistent

with leaving the residence. The location records were consistent with movement of BABA's cellular phone east from the Target Residence at 11:09 a.m..

Technical Terms and Forensic Analysis

62. Based on my training and experience, I use the following technical terms to convey the following meanings:

- a. Wireless telephone: A wireless telephone (or mobile telephone, or cellular telephone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional "land line" telephones. A wireless telephone usually contains a "call log," which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include: storing names and phone numbers in electronic "address books;" sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Wireless telephones may also include global positioning system ("GPS") technology for determining the location of the device.
- b. Digital camera: A digital camera is a camera that records pictures as digital picture files, rather than by using photographic film. Digital cameras use a variety of fixed and removable storage media to store their recorded images. Images can usually be retrieved by connecting the camera to a computer or by connecting the

removable storage medium to a separate reader. Removable storage media include various types of flash memory cards or miniature hard drives. Most digital cameras also include a screen for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos.

- c. Portable media player: A portable media player (or “MP3 Player” or iPod) is a handheld digital storage device designed primarily to store and play audio, video, or photographic files. However, a portable media player can also store other digital data. Some portable media players can use removable storage media. Removable storage media include various types of flash memory cards or miniature hard drives. This removable storage media can also store any digital data. Depending on the model, a portable media player may have the ability to store very large amounts of electronic data and may offer additional features such as a calendar, contact list, clock, or games.
- d. GPS: A GPS navigation device uses the Global Positioning System to display its current location. It often contains records of the locations where it has been. Some GPS navigation devices can give a user driving or walking directions to another location. These devices can contain records of the addresses or locations involved in such navigation. The Global Positioning System (generally abbreviated “GPS”) consists of 24 NAVSTAR satellites orbiting the Earth. Each satellite contains an extremely accurate clock. Each satellite repeatedly transmits by radio a mathematical representation of the current time, combined with a special sequence of numbers. These signals are sent by radio, using specifications that are publicly available. A GPS antenna on Earth can receive those signals. When a GPS antenna receives signals from at least four satellites, a computer connected to that antenna

can mathematically calculate the antenna's latitude, longitude, and sometimes altitude with a high level of precision.

- e. PDA: A personal digital assistant, or PDA, is a handheld electronic device used for storing data (such as names, addresses, appointments or notes) and utilizing computer programs. Some PDAs also function as wireless communication devices and are used to access the Internet and send and receive e-mail. PDAs usually include a memory card or other removable storage media for storing data and a keyboard and/or touch screen for entering data. Removable storage media include various types of flash memory cards or miniature hard drives. This removable storage media can store any digital data. Most PDAs run computer software, giving them many of the same capabilities as personal computers. For example, PDA users can work with word-processing documents, spreadsheets, and presentations. PDAs may also include GPS technology for determining the location of the device.

63. Based on my knowledge, training, and experience, I know that modern cellular phones often have capabilities that allow them to serve as a wireless telephone, digital camera, portable media player, GPS navigation device, and PDA. In my training and experience, examining data stored on devices of this type can uncover, among other things, evidence that reveals or suggests who possessed or used the device.

64. Based on my knowledge, training, and experience, I know that electronic devices like cellular phones can store information for long periods of time. Similarly, things that have been viewed via the Internet are typically stored for some period of time on the device. This information can sometimes be recovered with forensics tools.

65. As described above and in Attachment B, this application seeks permission to search for records that might be found on the Premises, in whatever form they are found. One

form in which the records might be found is data stored on the target's cellular phones. Thus, the warrant applied for would authorize the seizure of the target's cellular phones or, potentially, the copying of electronically stored information, all under Rule 41(e)(2)(B).

66. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crimes described on the warrant, but also forensic electronic evidence that establishes how electronic devices were used, the purpose of their use, who used them, and when. There is probable cause to believe that this forensic electronic evidence will be on any electronic device in the Premises because:

- f. Data on a device can provide evidence of a file that was once on the device but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file).
- g. Forensic evidence on a device can also indicate who has used or controlled the device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence.
- h. A person with appropriate familiarity with how an electronic device works may, after examining this forensic evidence in its proper context, be able to draw conclusions about how electronic devices were used, the purpose of their use, who used them, and when.
- i. The process of identifying the exact electronically stored information on a device that is necessary to draw an accurate conclusion is a dynamic process. Electronic evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a device is evidence may depend on other information stored on the device and the application of knowledge

about how the device behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.

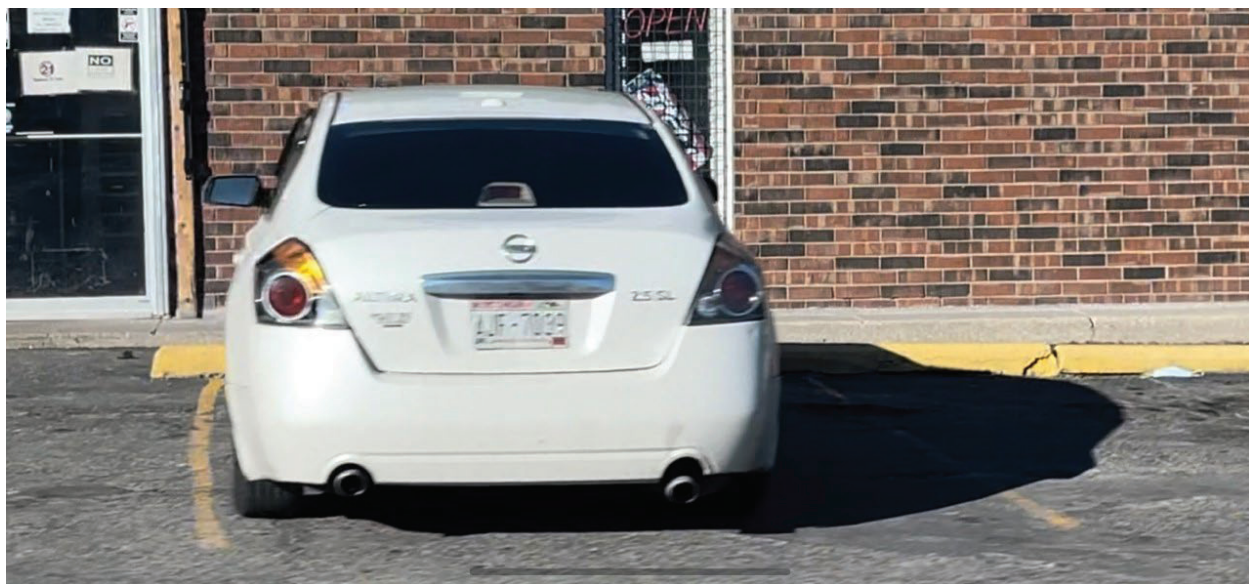
- j. Further, in finding evidence of how a device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium.
- k. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of electronic devices consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

CONCLUSION

67. Based upon the information contained in this affidavit, I believe there is probable cause to believe that ABDI I. BABA has committed violations of Title 18, United States Code, Section 1591, Hobbs Act Robbery, and Title 18, United States Code, Section 924(c), Brandishing of a Firearm during a crime of Violence, and that there is probable cause to believe that evidence of the aforementioned crime will be found during a search of the “Target Location” and the “Target Vehicle” listed in this affidavit and further described in Attachment A.

ATTACHMENT A
Property to be Searched

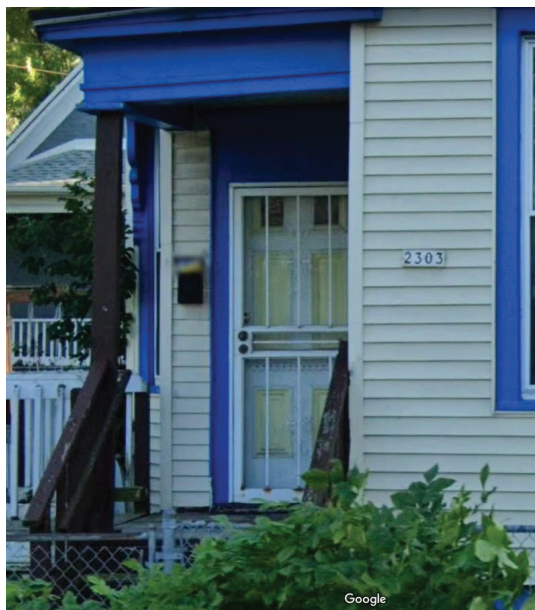
A 2010, white Nissan, Altima: The vehicle is more particularly described as a 2010, white Nissan, Altima, with dark tinted windows, aluminum wheel wells, sunroof, and WI plate AJF-7039. The VIN number on the vehicle is 1N4AL2AP0AN491991. This vehicle is referred to as the “Target Vehicle.”



ATTACHMENT A
Property to be Searched

2303 W. Cherry Street, Milwaukee, WI: The location is more particularly described as a two-story residence, light yellow colored siding, with blue trim, and a chain linked fence surrounding the house. The number 2303 is posted on the northeast corner, on the northern portion of the siding. This residence is referred to as the “Target Location”.





ATTACHMENT B
Items to be Seized

All records and information related to violations of Title 18, United States Code, Section 1591, Hobbs Act Robbery, and Title 18, United States Code, Section 924(c), Brandishing of a Firearm during a crime of Violence, including but not limited to:

1. Firearms including pistols, handguns, shotguns, rifles, assault weapons, machine guns, magazines used to hold ammunition, silencers, components of firearms including laser sights and other components which can be used to modify firearms, ammunition and ammunition components, bulletproof vests, and any and all documentation related to the purchase of such items.
2. Indicia of occupancy, residency or ownership of the premises and things described in the warrant, including but not limited to utility bills, telephone bills, loan payment receipts, rent receipts, trust deeds, lease or rental agreements, addressed envelopes, escrow documents and keys.
3. Cellular telephones, iPhones, iPads, and computers and all electronic storage areas on the device including text messages, digital video recordings or other areas that may contain photographs or video depictions of firearms or other evidence of the possession of firearms or any Hobbs Act violations.
4. Mail including but not limited to letter, flats, postcards, packages, bags, or other sealed or unsealed articles addressed to individuals and addresses other than those individuals who reside at the address 2303 W. Cherry Street, Milwaukee, Wisconsin.
5. Clothing worn during the robberies: Black hooded sweatshirt, black pants, gray hooded sweatshirt, beach styled square sunglasses, black balaclava, black ski mask. Aviator styled sunglasses with plastic frames and gray or black lenses, dark blue jeans
6. Any and all objects, compartments, storage containers, safes, lock boxes, concealed passages, or areas within the residence in which any of the above-mentioned items can be concealed, secured, hidden, or otherwise out of sight or access to law enforcement
7. Checks, bank information, statements, credit/debit cards believed to be associated to fraudulent check depositing including but not limited to printers, check stock, and/or any property of the USPS.

As used above, the terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including

any form of computer or electronic storage (such as hard disks or other media that can store data); any handmade form (such as writing, drawing, painting); any mechanical form (such as printing or typing); and any photographic form (such as microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, or photocopies).